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Ex parte meeting

Nancy Bell *NFB 4/3/02*
Attorney Advisor

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US DOT Docket Management System
Docket NHTSA-00-8011-33

At the request of the Rubber Manufacturers Association (RMA), NHTSA met on April 2, 2002, with the RMA from approximately 2:00 pm to 3:30 pm. A listing of RMA and NHTSA representatives that attended this meeting is attached.

At this meeting, NHTSA responded to questions of clarification submitted by RMA in writing to NHTSA prior to the meeting. NHTSA also noted that the agency will add appropriate data from current tire strength (road hazard impact) testing to the docket when the testing is completed.

A document memorializing RMA's questions and NHTSA's responses is attached.

Attachments

NHTSA/RMA Tire Meeting

April 2, 2002

List of Attendees

NAME	ORGANIZATION	TELEPHONE
1. Steve Butcher	RMA	202-682-4841
2. June Satterfield	Michelin	864-422-4704
3. RICHARD TOLBERT	MICHELIN	864-422-4331
4. J. Stephen Hardy	Continental Tire	704-583-8847
5. Dennis Candido	BRIDGESTONE/Firestone	330-379-6356
6. Red Hermann	Michelin	864-458-6169
7. JOHN R. HARRIS	CONTINENTAL TIRE N.A.	330 798 3976
8. JOHN E RUMEL	GOODYEAR	330-776-3320
9. SHAHID A. SHERWANI	YOKOHAMA TIRE CORP	540-375-8415
10. LYLE CAMPBELL	COOPER TIRE	419-424-4312
11. E. PAUL DANIELS	PIRELLI TIRE N.A.	203-784-2524
12. BOB WYANT	BRIDGESTONE/FIRESTONE	615-872-1350
13. Tim Simons	NHTSA, Law & Policy	202-366-2555
14. Claudio Harris	NHTSA, Rulemaking	202-366-2720
15. George Goodo	NHTSA Rulemaking	202/366-5274
16. George Gillespie	NHTSA (NSA-32)	202-366-5299
17. John Finnegan	NHTSA (NSA-31)	202-366-0645
18. Nancy Bell	NHTSA & NCC-20)	366-02992
19. ART CAITEN	NHTSA (NRD-12)	366-5669
20. August BURGETT	NHTSA NRD-12	202-366-5672
21. H. LETHA BREWER	NHTSA NRD-12	202-366-5671

22	LEIGH H. SMYTHE	RMA	202/682-4843
23	Ted Bayler	NSA-31	202/366-5303

NHTSA/RMA Tire Meeting

April 2, 2002

2.1.1 Rationale for Pass/Fail

What rationale did the agency use in determining stringency levels for various test criteria, particularly since the net result may require a redesign of more than 30 percent of existing tires?

NHTSA Response

- The agency determined the stringency levels based on our assessment of the tire testing results and what we believe represents an upgrade of the tire performance requirements for P-metric and LT tires.

2.1.2 Ambient temperature

Why does the agency think 40°C is significantly different than 38°C?

NHTSA Response

- The agency believes that 38°C is not significantly different from 40°C.

2.1.3 Timing for pressure measurement

What safety consequences has the agency considered as a result of a requirement to inspect a hot tire within **15** minutes of test completion?

NHTSA Response

- The current requirements state that the tire pressure must be measured immediately after the completion of the test.
- The agency will consider any industry recommendations on tire inspection safety submitted in the comments, including those in the GTS-2000 proposal.

2.1.4 Curved versus flat surface

What is the agency's position on flat versus curved surface stringency comparisons?

NHTSA Response

- The agency has no official position on flat versus curved surface stringency comparisons.
- We welcome any comments and data in your comments to the NPRM.

2.2 High speed testing

What lower speed options did the agency consider for application of this test for tires requiring deep lugs, or for true mud and snow tires with snowflake stamping?

NHTSA Response

- The NPRM represents the agency's proposal and the preamble discusses the options we've considered for the high speed test. If you believe that we should consider other lower speed options for some types of tires that will be tested for high speed performance, please include those recommendations in your comments to the NPRM.

2.3 Endurance testing

What rationale did the agency use in determining severity levels for individual test criteria? How did the agency evaluate the cumulative effect of these changes to the overall test severity?

NHTSA Response

- The agency looked at the combination of test parameters for the proposed endurance requirements and determined that it represents a more real-world test and an increase in stringency over FMVSS 109 endurance test, with an **18** percent increase in the duration, a 10percent increase in the load, and a 50 percent increase in the speed.

2.4 Low pressure tests

Compare and contrast the two test options relative to severity and appropriateness.

NHTSA Response

- The purpose of the low pressure test is to ensure that a tire can be safely operated for a minimum time-frame at the low threshold warning inflation level for TPMS warning lamp activation.
- The first alternative somewhat mirrors the endurance test in its speed (120 km/h) and load (100% of sidewall load limit).
- The second alternative includes speeds similar to the speeds used in the high speed test for a similar duration at each speed step.
- We hope that you will provide the agency with comments on which alternative you consider to be more appropriate.

2.5 Road hazard impact test

What is the agency's intended research plan for this test? Explain plan for introduction of this test. Will implementation be delayed until more development is completed? Is there a role for RMA coordination with NHTSA research?

NHTSA Response

- Agency plans additional testing based on comments received to the NPRM
- Tests may include tests based on the current Standard 109 and on the proposed SAE J 1981 Road Hazard Impact recommended practice.
- If the **RMA** has research findings that would assist the agency in its decision for the final rule, we would welcome those findings in your comments.

2.6 Bead Unseating test

What is the agency's intended research plan for this test? Explain plan for introduction of this test. Will implementation be delayed until more development is completed? Is there a role for RMA coordination with NHTSA research?

NHTSA Response

- Agency plans additional testing based on comments received to the NPRM
- The agency's 1997-1998 dynamic rollover testing and recent data from NCAP testing provide a strong rationale for upgrading the bead unseating requirements
- Tests may include tests based on the current Standard 109 and on the proposed wedge test.

2.7 Tire Aging Tests

What is the agency's thinking on the inverse correlation in the peel test results relative to the other aging tests options? What was the agency's rationale for selection of 75°C for the oven age temperature, and were other temperatures considered?

NHTSA Response

- The agency's thinking on the peel test is fully reflected in the preamble and the regulatory proposal in the NPRM.
- If the industry has additional data and information on oven aging to share with the agency, please provide them with your comments. Incidentally, there were very few failures (2 of 36 tires) in the oven aging testing the agency conducted.

3.0 Tire Selection

What is the agency's concept of the need for and application of tire reserve pressure/load?

NHTSA Response

- The agency is considering this issue in the tire upgrade and we'll review the comments we receive.
- The final rule will provide the agency's decision on this issue.
- We have a 1981 report (Docket 81-09) on the safety impact of tire reserve load, which concluded that no relationship exists between reserve load percentage and tire failure rate.

- If the tire industry has updated information showing a correlation between reserve load percentage and tire failure rate, we'll be happy to consider it in our decision for the final rule.

4.0 Phase-in period

Given the severity of the proposed updates, what is the rationale for proposing a 2- or 3-year phase-in?

NHTSA Response

- A 3-year implementation with a phase-in for P-metric tires has been proposed as an alternative so as to give tire manufacturers more time to make any needed changes on P-metric tires. LT tires have a later effective date since we expect that they would require more modifications than P-metric to comply with the new requirements.
- The 2-year implementation does not include a phase-in for P-metric tires.
- If you have any concerns about the implementation schedule proposed, please raise those concerns in your docket comments.

5.0 Agency Comments

Are there items that the agency would like to inform the tire industry about?

NHTSA Response

- Our NPRM represents the agency's proposal and any additional information that needs to be made public will be placed in the docket.
- The agency plans to publish a correction notice in the Federal Register shortly.